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Attorneys for Defendants 2701 Decatur, LLC and ConAm Management Corporation

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KEITH JOHNSON as guardian ad litem for COLE
JOHNSON, a minor,

Plaintiffs,

v.

2701 DECATUR LLC, a foreign limited-liability
company; CONAM MANAGEMENT
CORPORATION, a foreign corporation;
RANCHO DEL REY APARTMENTS LLC, a
domestic limited-liability company; BOUNTIFUL
PROPERTIES & INVESTMENTS, INC. d/b/a
RANCHO DEL REY APARTMENTS; DOES 1
through 100; and ROE CORPORATION 101
through 200, inclusive,

Defendants.

CASE NO. 2:16-cv-00777-RFB-NJK

**STIPULATION AND ORDER TO
REMAND ACTION PURSUANT TO 28
U.S.C. §1447**

IT IS HEREBY STIPULATED by and between Scott L. Poisson, Esq. and Brian Boyer, Esq., of BERNSTEIN & POISSON, attorney for Plaintiffs, and Kym Samuel Cushing, Esq. and Virginia T. Tomova, Esq. of WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP, attorneys for Defendants 2701 DECATUR LLC and CONAM MANAGEMENT CORPORATION, that the total value of damages in this action does not exceed this Court's required amount of SEVENTY-FIVE THOUSAND DOLLARS and NO CENTS (\$75,000.00) necessary to maintain subject matter jurisdiction in this Court, this case shall be REMANDED to the Eighth Judicial District Court of Clark County, Nevada for all further proceedings.

IT IS FURTHER STIPULATED that Plaintiff WAIVES any right to collectively recover any monies above and beyond SEVENTY-FIVE THOUSAND DOLLARS (\$75,000.00) in this action against Defendant, resulting from the incident that occurred on or about January 8, 2014.

1 Additionally, it is STIPULATED by and between the parties that Plaintiff will respond to the
2 written discovery propounded by Defendant (interrogatories, request for production of documents,
3 and request for admissions) by September 26, 2016.

4 DATED this 15th day of September, 2016.

DATED this 14th day of September, 2016.

5 **WILSON, ELSER, MOSKOWITZ,**
6 **EDELMAN & DICKER LLP**

BERNSTEIN & POISSON

7 BY: /s/ Kym Cushing

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11 *Attorneys for Defendants 2701 Decatur, LLC and*
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BY: /s/ Brian Boyer

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Attorneys for Plaintiff Keith Johnson as
guardian ad litem for Cole Johnson, a minor

12 **ORDER**

13 IT IS SO ORDERED.

14 Dated this 25th day of September, 2016.

15 

16 **RICHARD F. BOULWARE, II**
17 United States District Judge

18 Prepared and Respectfully Submitted by:

19 **WILSON, ELSER, MOSKOWITZ, EDELMAN**
& DICKER LLP

20 BY: /s/ Kym Cushing

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24 *Attorneys for Defendant Costco Wholesale Corporation*